

EXHIBIT L

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF HERNANDO FERNANDEZ

I, HERNANDO FERNANDEZ, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at One World Trade Center (North Tower) when the terrorist attacks of the World Trade Center occurred.

4. On September 11, 2001, I was working as a security guard for Summit Security Services, Inc. in the lobby of the North Tower at the elevator signing people in and out and checking their identifications. My supervisor and I were standing in the lobby discussing my assignment when suddenly the building shook violently. We had little time to investigate because the building continued to shake until something exploded. The wires on freight elevator 50 had snapped and the elevator plummeted to the lobby causing a tremendous explosion with a fireball

and smoke blasting out from the elevator shaft. At the same time the impact threw me across the lobby floor, I witnessed my supervisor get sucked up in the fireball and then his body blew past me as I crashed against a glass wall or glass door injuring my face, head, knees and legs. After that, I couldn't see anything due to the smoke and debris. It was pure panic. The pain was unbearable and I was dazed and confused, and could barely walk. My scalp and skin were burned. I ran outside and fell into the glass of a bus stop structure.

5. I was in New York City when the plane(s) hit the towers and I received physical injuries in the escape and collapse. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever.

6. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: sprain and strain of the medial collateral ligament of my left knee; sprain and strain of the deltoid ligament of my left ankle and foot; contusion to my forehead with swelling and headache; contusion of my left knee; and contusion of my left lower leg and calf area.

7. After September 11, 2001, I developed PTSD with intense symptoms of anxiety and depression, a sleep disorder, nightmares, and intrusive thoughts during the day. I perceived my imminent death and the deaths of many others around me. It was pure panic.

8. As a result of the September 11, 2001, terrorist attacks, I sought medical attention for my injuries in the Emergency Room at St. John's Hospital, and orthopaedic surgeon, Dr. Henry Marano. For my PTSD, I sought help with a therapist, Dr. Monica Brignolo. Attached

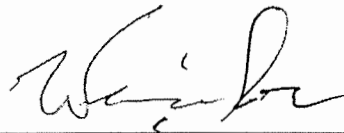
as Exhibit B to this Declaration is a true and correct copy of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

9. I suffered, and continue to suffer, severe emotional distress with constant thoughts and flashbacks as a result of the terrorist attacks on the World Trade Center. I suffered and continue to suffer from anxiety and bouts of depression and sleeplessness due to the traumatic events of these terrorist attacks.

10. I previously pursued a claim (Claim Number VCF 212-000-792) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 20 day of December, 2019.

A handwritten signature in black ink, appearing to read 'Hernando Fernandez', written over a horizontal line.

Signature of Declarant Hernando Fernandez

Exhibits Filed Under Seal